

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

NICHOLE DANIELS-FEASEL, Individually
and as parent and natural guardian of infant
C.F., *et al.*,

Plaintiffs,

v.

FOREST LABORATORIES INC., *et al.*,

Defendants.

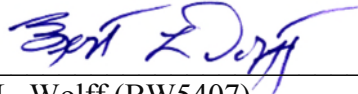
Civ. Action No. 17-cv-4188 (LTS) (JLC)

**FOREST’S OMNIBUS MOTION TO EXCLUDE
PLAINTIFFS’ EXPERT TESTIMONY ON GENERAL CAUSATION**

The Forest Defendants move to exclude the general causation expert testimony of Lemuel Moyé, M.D., Ph.D., Laura Plunkett, Ph.D., and Patricia Whitaker-Azmitia, Ph.D., pursuant to Federal Rules of Evidence 104(a), 702, 703, and 403, and *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 509 U.S. 579 (1993), and its progeny. In support of this motion, the Forest Defendants rely on their Memorandum of Law in Support of Forest’s Omnibus Motion to Exclude Plaintiffs’ Expert Testimony on General Causation, the Transmittal Declaration of Bert L. Wolff and the exhibits attached thereto, and submitted in accordance with ECF No. 78.

WHEREFORE, the Forest Defendants respectfully request an Order from this Court excluding the general causation expert testimony of Lemuel Moyé, M.D., Ph.D., Laura Plunkett, Ph.D., and Patricia Whitaker-Azmitia, Ph.D. and granting Defendants such other and further relief as the Court deems just and proper. Pursuant to Local Rule 6.1 of the United States District Court for the Southern District of New York, Defendants respectfully request oral argument on this motion.

Dated: June 21, 2019



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